

EXHIBIT 15



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November 22, 2021

VIA EMAIL

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Re: Inteliquent's Objections and Responses to Notice of Records Custodian Deposition

Dear David:

We write in response to your November 17 letter. We echo your sentiment about the productivity of our call on Tuesday. We appreciate the efforts to resolve issues and move forward productively.

1. **Two-Day Deposition.** When Inteliquent indicated it would be willing to go forward on December 7, 2021, it was prior to our meet-and-confer and under the assumption that the parties would resolve Inteliquent's objections prior to the deposition. You subsequently stated that the plaintiffs wanted to move forward with a piecemeal, two-day deposition, with the first deposition taking place on December 7 as to any topics to which Inteliquent did not object. We certainly understand your position, but we decline to present our records custodian twice for a 5-hour deposition.
2. **Objections and the T-Mobile motion.** During our meet-and-confer last week, we agreed that we were unlikely to resolve most of Inteliquent's objections to numerous noticed topics without court intervention. Since our conference, T-Mobile filed a motion for a protective order addressing at least 20 of the topics to which Inteliquent also objects. For efficiency purposes, we do not believe that Judge Gilbert should have to address the same issues twice. We assume you agree it would be inefficient to have the topics before him twice. Inteliquent has also raised several positions on these overlapping topics that are unique to Inteliquent. We therefore believe that the most efficient course of action is for Inteliquent to file a motion for a protective order that will allow Judge Gilbert to address these issues once for all parties. We are aware of the Court's briefing schedule on T-Mobile's motion and intend on filing our motion by November 29. Inteliquent's motion will only address the areas in which we have disagreement.



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3. **Timeline disagreement.** Inteliquent's records custodian deponent would be prepared to testify as to the existence and current location of documents. Our objection—consistent with our objection to the document requests—is that the appropriate time period for potentially relevant information (including document productions) is January 1, 2015 to April 16, 2018 (with a brief extension to the end of April as we previously indicated). Hopefully, this is not an item on which we would need court intervention.
4. **Topic No. 2.** Inteliquent can confirm that it has retained its CDRs (or the underlying raw data) relating to T-Mobile traffic Inteliquent carried from approximately June 2015 until the date the Consent Decree was released on April 16, 2018. As discussed on our call, we trust that this negates any further need for testimony relating to Topic No. 2 or Inteliquent litigation holds generally. We otherwise maintain our objections to Topic No. 2. Hopefully, this would also narrow the range of any dispute.
5. **Topic Nos. 10, 12, 15, 17-36, 43-45, 53, 55-58.** We continue to disagree with your characterization of the topics referenced on page 4 of your November 17 letter. We stand on our objections and positions in our November 15 letter on these topics. Thank you for proposing minor modifications to five topics, which we are reviewing and will respond to separately.
6. **Topics 45-50, 51-52.** As stated in our November 15 letter, we are willing to discuss these topics with you for purposes of a custodial records deposition.

We feel that it is worthwhile to attempt to resolve some of the pending disputes regarding the scope of the records custodian deposition. We are available to conclude our meet-and-confer on November 23 or 24. Please let us know of your availability, so we can schedule a mutually available time.

Very truly yours,

/s/ *Michael Pullos*

Michael Pullos

cc: Counsel of record